

COMPLIANCE WORKING RECORD

Controller, processor and joint-controller role mapper

Fictional sample. Requires tailoring and responsible review.

Document control

Field	Value
Document type	Controller, processor and joint-controller role mapper
Document reference	FICTIONAL-PRIVACY-1
Jurisdiction	Customer-selected EU exercise scope
Version	1
Status	Named privacy decision workpaper prepared
Prepared by	Fictional responsible privacy reviewer
Prepared on	2026-10-09T18:00:00Z
Rule pack	2026-10-09.privacy-decision.1
Generated	October 9, 2026

Purpose and boundary

Produce a relationship-specific controller, processor and joint-controller analysis from actual purpose, essential-means and instruction decisions.

Map each party within one processing activity. Compare actual purpose and essential-means decisions, separate own purposes, approved instructions and joint arrangements. Retain contrary reported roles and unresolved allocations for approval.

This workpaper applies exact customer-selected rules to supplied facts and prepares source-linked decisions and drafts. The customer confirms jurisdiction, coverage, operative rule version, populations and approvals. It does not certify legal applicability, exemption, consent authenticity, DPO appointment, notice delivery or a permitted transaction. Exact originals stay browser-local unless explicitly saved through paid private cloud saving.

Approved scope and privacy decision method

Fictional exercise only. Exact selected cases, operative rules and source records. Replace every fact, rule and decision before use.

Scope approval. FICTIONAL-SCOPE-1

Approved method. Fictional privacy preparation procedure 1. Source. f1. Locator. /methodVersion. Approver. Fictional authorized preparation-method approver. Approval date. 2026-01-02T12:00:00Z

Population statement. Declared complete population. Customer-declared case count. 1

Relationship-specific role analysis case inputs

The first 20 exact task rows appear here. Displayed values are bounded to 1000 characters. Complete typed rows and exact values remain in Excel and JSON.

ID	Facts
1	Case ID. CASE-1 Description. Fictional exact selected privacy case. Replace every fact and rule before use. Entity Id. ENTITY-1 Jurisdiction. Customer-selected EU exercise scope Regime. GDPR Instrument. Fictional customer-approved operative instrument Provision. Fictional selected preparation provision 1 Rule Version. Fictional operative rule 1 Operative rule source file ID. f1 Operative rule source locator. /rules/0/ruleVersion Rule effective from. 2026-01-01 Rule effective through. Rule Approved By. Fictional authorized rule reviewer Rule approval timestamp. 2026-01-02T12:00:00Z Activity Id. ACTIVITY-1 Data Category. Fictional selected records Approved Scope Basis. Fictional exercise scope only. No real applicability is inferred. Population Mode. Declared complete population Declared Row Count. 2 Original source file ID. f2 Original JSON record pointer. /cases/0 Original source binding. Exact JSON record Supporting evidence IDs. ["PROOF-cases-CASE-1"]

Parties

The first 20 exact task rows appear here. Displayed values are bounded to 1000 characters. Complete typed rows and exact values remain in Excel and JSON.

ID	Facts
1	Party Id. PARTY-1 Case ID. CASE-1 Name. Fictional customer entity Entity Type. Fictional controller candidate Original source file ID. f3 Original JSON record pointer. /parties/0 Original source binding. Exact JSON record Supporting evidence IDs. ["PROOF-parties-PARTY-1"]
2	Party Id. PARTY-2 Case ID. CASE-1 Name. Fictional service provider Entity Type. Fictional processor candidate Original source file ID. f3 Original JSON record pointer. /parties/1 Original source binding. Exact JSON record Supporting evidence IDs. ["PROOF-parties-PARTY-2"]

Relationships

The first 20 exact task rows appear here. Displayed values are bounded to 1000 characters. Complete typed rows and exact values remain in Excel and JSON.

ID	Facts
1	Relationship Id. ROLE-1 Case ID. CASE-1 Activity Id. ACTIVITY-1 Party Id. PARTY-1 Purpose Decision. Determines Essential Means Decision. Determines Own Purpose. Yes Appointed By Party Ids. [] Instructions Ref. Joint With Party Ids. [] Joint Arrangement Ref. Reported Role. Controller Reason. Fictional customer controls this exact purpose and essential means. Original source file ID. f3 Original JSON record pointer. /relationships/0 Original source binding. Exact JSON record Supporting evidence IDs. ["PROOF-relationships-ROLE-1"]
2	Relationship Id. ROLE-2 Case ID. CASE-1 Activity Id. ACTIVITY-1 Party Id. PARTY-2 Purpose Decision. Does not determine Essential Means Decision. Does not determine Own Purpose. No Appointed By Party Ids. ["PARTY-1"] Instructions Ref. Fictional approved instructions 1 Joint With Party Ids. [] Joint Arrangement Ref. Reported Role. Processor Reason. Fictional provider acts only on the actual approved instructions. Original source file ID. f3 Original JSON record pointer. /relationships/1 Original source binding. Exact JSON record Supporting evidence IDs. ["PROOF-relationships-ROLE-2"]

Decisions

The first 20 exact task rows appear here. Displayed values are bounded to 1000 characters. Complete typed rows and exact values remain in Excel and JSON.

ID	Facts
1	Decision Id. DEC-parties-PARTY-1 Case ID. CASE-1 Record Type. parties Record Id. PARTY-1 Outcome. Prepared for review Basis. Fictional source-supported review of this exact named record. Reviewed By. Fictional responsible privacy reviewer Reviewed At. 2026-10-09T18:00:00Z Original source file ID. f3 Original JSON record pointer. /decisions/0 Original source binding. Exact JSON record Supporting evidence IDs. ["PROOF-decisions-DEC-parties-PARTY-1"]

ID	Facts
2	Decision Id. DEC-parties-PARTY-2 Case ID. CASE-1 Record Type. parties Record Id. PARTY-2 Outcome. Prepared for review Basis. Fictional source-supported review of this exact named record. Reviewed By. Fictional responsible privacy reviewer Reviewed At. 2026-10-09T18:00:00Z Original source file ID. f3 Original JSON record pointer. /decisions/1 Original source binding. Exact JSON record Supporting evidence IDs. ["PROOF-decisions-DEC-parties-PARTY-2"]
3	Decision Id. DEC-relationships-ROLE-1 Case ID. CASE-1 Record Type. relationships Record Id. ROLE-1 Outcome. Prepared for review Basis. Fictional source-supported review of this exact named record. Reviewed By. Fictional responsible privacy reviewer Reviewed At. 2026-10-09T18:00:00Z Original source file ID. f3 Original JSON record pointer. /decisions/2 Original source binding. Exact JSON record Supporting evidence IDs. ["PROOF-decisions-DEC-relationships-ROLE-1"]
4	Decision Id. DEC-relationships-ROLE-2 Case ID. CASE-1 Record Type. relationships Record Id. ROLE-2 Outcome. Prepared for review Basis. Fictional source-supported review of this exact named record. Reviewed By. Fictional responsible privacy reviewer Reviewed At. 2026-10-09T18:00:00Z Original source file ID. f3 Original JSON record pointer. /decisions/3 Original source binding. Exact JSON record Supporting evidence IDs. ["PROOF-decisions-DEC-relationships-ROLE-2"]

Evidence

The first 20 exact task rows appear here. Displayed values are bounded to 1000 characters. Complete typed rows and exact values remain in Excel and JSON.

ID	Facts
1	Evidence Id. PROOF-cases-CASE-1 Record Type. cases Record Id. CASE-1 File Id. f2 Source Sha256. 3a44a6f8c04f173fd684a2adc6f275133efe69f0dd94a3f9feaf6d14fcabda74 Locator. /cases/0 Conclusion. Supports Reviewer. Fictional responsible source reviewer Reviewed At. 2026-10-09T18:00:00Z
2	Evidence Id. PROOF-parties-PARTY-1 Record Type. parties Record Id. PARTY-1 File Id. f3 Source Sha256. ee907c1cb78a5c2278f103c14c5813ef64813ae3beb90ab4f23f7a41628db0be Locator. /parties/0 Conclusion. Supports Reviewer. Fictional responsible source reviewer Reviewed At. 2026-10-09T18:00:00Z
3	Evidence Id. PROOF-parties-PARTY-2 Record Type. parties Record Id. PARTY-2 File Id. f3 Source Sha256. ee907c1cb78a5c2278f103c14c5813ef64813ae3beb90ab4f23f7a41628db0be Locator. /parties/1 Conclusion. Supports Reviewer. Fictional responsible source reviewer Reviewed At. 2026-10-09T18:00:00Z
4	Evidence Id. PROOF-relationships-ROLE-1 Record Type. relationships Record Id. ROLE-1 File Id. f3 Source Sha256. ee907c1cb78a5c2278f103c14c5813ef64813ae3beb90ab4f23f7a41628db0be Locator. /relationships/0 Conclusion. Supports Reviewer. Fictional responsible source reviewer Reviewed At. 2026-10-09T18:00:00Z

ID	Facts
5	Evidence Id. PROOF-relationships-ROLE-2 Record Type. relationships Record Id. ROLE-2 File Id. f3 Source Sha256. ee907c1cb78a5c2278f103c14c5813ef64813ae3beb90ab4f23f7a41628db0be Locator. /relationships/1 Conclusion. Supports Reviewer. Fictional responsible source reviewer Reviewed At. 2026-10-09T18:00:00Z
6	Evidence Id. PROOF-decisions-DEC-parties-PARTY-1 Record Type. decisions Record Id. DEC-parties-PARTY-1 File Id. f3 Source Sha256. ee907c1cb78a5c2278f103c14c5813ef64813ae3beb90ab4f23f7a41628db0be Locator. /decisions/0 Conclusion. Supports Reviewer. Fictional responsible source reviewer Reviewed At. 2026-10-09T18:00:00Z
7	Evidence Id. PROOF-decisions-DEC-parties-PARTY-2 Record Type. decisions Record Id. DEC-parties-PARTY-2 File Id. f3 Source Sha256. ee907c1cb78a5c2278f103c14c5813ef64813ae3beb90ab4f23f7a41628db0be Locator. /decisions/1 Conclusion. Supports Reviewer. Fictional responsible source reviewer Reviewed At. 2026-10-09T18:00:00Z
8	Evidence Id. PROOF-decisions-DEC-relationships-ROLE-1 Record Type. decisions Record Id. DEC-relationships-ROLE-1 File Id. f3 Source Sha256. ee907c1cb78a5c2278f103c14c5813ef64813ae3beb90ab4f23f7a41628db0be Locator. /decisions/2 Conclusion. Supports Reviewer. Fictional responsible source reviewer Reviewed At. 2026-10-09T18:00:00Z
9	Evidence Id. PROOF-decisions-DEC-relationships-ROLE-2 Record Type. decisions Record Id. DEC-relationships-ROLE-2 File Id. f3 Source Sha256. ee907c1cb78a5c2278f103c14c5813ef64813ae3beb90ab4f23f7a41628db0be Locator. /decisions/3 Conclusion. Supports Reviewer. Fictional responsible source reviewer Reviewed At. 2026-10-09T18:00:00Z

Actions

The first 20 exact task rows appear here. Displayed values are bounded to 1000 characters. Complete typed rows and exact values remain in Excel and JSON.

Relationship-specific role analysis

The first 20 prepared output rows appear here. Complete rows remain in Excel and JSON.

ID	Result
ROLE-1	Item. ROLE-1 Case ID. CASE-1 Party ID. PARTY-1 Activity ID. ACTIVITY-1 Analysis candidate. Controller Reported role. Controller Reason. Fictional customer controls this exact purpose and essential means. Result. Prepared for review
ROLE-2	Item. ROLE-2 Case ID. CASE-1 Party ID. PARTY-2 Activity ID. ACTIVITY-1 Analysis candidate. Processor Reported role. Processor Reason. Fictional provider acts only on the actual approved instructions. Result. Prepared for review

Owned privacy decision actions and dependencies

The first 20 prepared output rows appear here. Complete rows remain in Excel and JSON.

Named privacy decision draft sections

The first 20 prepared output rows appear here. Complete rows remain in Excel and JSON.

ID	Result
DEC-parties-PARTY-1	<p>Item. DEC-parties-PARTY-1 Case ID. CASE-1 Decision. Prepared for review Draft text. Privacy decision working record. Prepared for review</p> <p>Case. CASE-1. Exact record. parties/PARTY-1.</p> <p>Customer decision basis. Fictional source-supported review of this exact named record.</p> <p>Responsible reviewer. Fictional responsible privacy reviewer. Review instant. 2026-10-09T18:00:00Z.</p> <p>This workpaper applies exact customer-selected rules to supplied facts and prepares source-linked decisions and drafts. The customer confirms jurisdiction, coverage, operative rule version, populations and approvals. It does not certify legal applicability, exemption, consent authenticity, DPO appointment, notice delivery or a permitted transaction. Exact originals stay browser-local unless explicitly saved through paid private cloud saving.</p>
DEC-parties-PARTY-2	<p>Item. DEC-parties-PARTY-2 Case ID. CASE-1 Decision. Prepared for review Draft text. Privacy decision working record. Prepared for review</p> <p>Case. CASE-1. Exact record. parties/PARTY-2.</p> <p>Customer decision basis. Fictional source-supported review of this exact named record.</p> <p>Responsible reviewer. Fictional responsible privacy reviewer. Review instant. 2026-10-09T18:00:00Z.</p> <p>This workpaper applies exact customer-selected rules to supplied facts and prepares source-linked decisions and drafts. The customer confirms jurisdiction, coverage, operative rule version, populations and approvals. It does not certify legal applicability, exemption, consent authenticity, DPO appointment, notice delivery or a permitted transaction. Exact originals stay browser-local unless explicitly saved through paid private cloud saving.</p>

ID	Result
DEC-relationships-ROLE-1	<p>Item. DEC-relationships-ROLE-1 Case ID. CASE-1 Decision. Prepared for review Draft text. Privacy decision working record. Prepared for review</p> <p>Case. CASE-1. Exact record. relationships/ROLE-1.</p> <p>Customer decision basis. Fictional source-supported review of this exact named record.</p> <p>Responsible reviewer. Fictional responsible privacy reviewer. Review instant. 2026-10-09T18:00:00Z.</p> <p>This workpaper applies exact customer-selected rules to supplied facts and prepares source-linked decisions and drafts. The customer confirms jurisdiction, coverage, operative rule version, populations and approvals. It does not certify legal applicability, exemption, consent authenticity, DPO appointment, notice delivery or a permitted transaction. Exact originals stay browser-local unless explicitly saved through paid private cloud saving.</p>
DEC-relationships-ROLE-2	<p>Item. DEC-relationships-ROLE-2 Case ID. CASE-1 Decision. Prepared for review Draft text. Privacy decision working record. Prepared for review</p> <p>Case. CASE-1. Exact record. relationships/ROLE-2.</p> <p>Customer decision basis. Fictional source-supported review of this exact named record.</p> <p>Responsible reviewer. Fictional responsible privacy reviewer. Review instant. 2026-10-09T18:00:00Z.</p> <p>This workpaper applies exact customer-selected rules to supplied facts and prepares source-linked decisions and drafts. The customer confirms jurisdiction, coverage, operative rule version, populations and approvals. It does not certify legal applicability, exemption, consent authenticity, DPO appointment, notice delivery or a permitted transaction. Exact originals stay browser-local unless explicitly saved through paid private cloud saving.</p>

Privacy decision draft. DEC-parties-PARTY-1. Prepared for review

Complete exact draft text remains in Excel and JSON.

Privacy decision working record. Prepared for review

Case. CASE-1. Exact record. parties/PARTY-1.

Customer decision basis. Fictional source-supported review of this exact named record.

Responsible reviewer. Fictional responsible privacy reviewer. Review instant. 2026-10-09T18:00:00Z.

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Privacy decision draft. DEC-parties-PARTY-2. Prepared for review

Complete exact draft text remains in Excel and JSON.

Privacy decision working record. Prepared for review

Case. CASE-1. Exact record. parties/PARTY-2.

Customer decision basis. Fictional source-supported review of this exact named record.

Responsible reviewer. Fictional responsible privacy reviewer. Review instant. 2026-10-09T18:00:00Z.

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Privacy decision draft. DEC-relationships-ROLE-1. Prepared for review

Complete exact draft text remains in Excel and JSON.

Privacy decision working record. Prepared for review

Case. CASE-1. Exact record. relationships/ROLE-1.

Customer decision basis. Fictional source-supported review of this exact named record.

Responsible reviewer. Fictional responsible privacy reviewer. Review instant. 2026-10-09T18:00:00Z.

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Privacy decision draft. DEC-relationships-ROLE-2. Prepared for review

Complete exact draft text remains in Excel and JSON.

Privacy decision working record. Prepared for review

Case. CASE-1. Exact record. relationships/ROLE-2.

Customer decision basis. Fictional source-supported review of this exact named record.

Responsible reviewer. Fictional responsible privacy reviewer. Review instant. 2026-10-09T18:00:00Z.

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Review findings

1 selected case scopes. 2 named result rows. 0 unresolved findings.

The first 100 findings and 1000 characters per displayed field appear here. Complete findings remain in the data exports.

Kind	ID	Result	Finding
Original cases source	CASE-1	Match ed	Every declared named fact matches the exact original JSON record.
Original parties source	PARTY-1	Match ed	Every declared named fact matches the exact original JSON record.
Original parties source	PARTY-2	Match ed	Every declared named fact matches the exact original JSON record.
Original relationships source	ROLE-1	Match ed	Every declared named fact matches the exact original JSON record.
Original relationships source	ROLE-2	Match ed	Every declared named fact matches the exact original JSON record.
Original decisions source	DEC-parties-PARTY-1	Match ed	Every declared named fact matches the exact original JSON record.
Original decisions source	DEC-parties-PARTY-2	Match ed	Every declared named fact matches the exact original JSON record.
Original decisions source	DEC-relationships-ROLE-1	Match ed	Every declared named fact matches the exact original JSON record.
Original decisions source	DEC-relationships-ROLE-2	Match ed	Every declared named fact matches the exact original JSON record.

Selected exact attachments

ID	Filename	Bytes	SHA-256
f1	fictional-approved-privacy-rules.json	134	51b7709466b97e6e69561465b32120cb6d00e7355e99beadea6e27d0f995d81e

ID	Filename	Bytes	SHA-256
f2	fictional-original-privacy-cases.json	850	3a44a6f8c04f173fd684a2adc6f275133efe69f0dd94a3f9feaf6d14fcabda74
f3	fictional-original-privacy-task-records.json	2691	ee907c1cb78a5c2278f103c14c5813ef64813ae3beb90ab4f23f7a41628db0be

Unresolved items and limitations

The first 100 unresolved items appear here, with 1000 characters per preview. Complete findings remain in Excel and JSON.

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Limitations

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Official sources

Source	Provision	Date	Link
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Source	Provision	Date	Link
EDPB: Guidelines 07/2020 on controller and processor	Final guidelines on factual purpose and means, processors acting on behalf of controllers, and joint participation. Contract labels alone do not decide the role.. Map each party within one processing activity. Compare actual purpose and essential-means decisions, separate own purposes, approved instructions and joint arrangements. Retain contrary reported roles and unresolved allocations for approval. No automated legal applicability or consent authenticity is inferred.	October 9, 2026	https://www.edpb.europa.eu/documents/guideline/guidelines-072020-on-the-concepts-of-controller-and-processor-in-the-gdpr_en